

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE NQ MOBILE
SECURITIES LITIGATION

This Document Relates to: All Actions

No. 1:13-cv-07608-WHP

**LEAD PLAINTIFFS' NOTICE OF UNOPPOSED MOTION AND MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Lead Plaintiffs Allene E. Mossman Trust, EJ Partners, HR Volin IRA, AM Volin IRA, EM Volin Roth IRA, JE Volin Roth IRA, EM Volin Trust, EM Volin IRA, and JE Volin IRA (collectively, "Lead Plaintiffs") respectfully submit this Notice of Unopposed Motion and Motion for entry of an order, in the form attached hereto as Exhibit A:

1. granting preliminary approval of the proposed settlement (the "Settlement") set forth in the Stipulation of Settlement dated October 8, 2015 (the "Stipulation");
2. conditionally certifying, for settlement purposes only, the proposed settlement class, and appointing class representatives and class counsel;
3. approving the form and manner of giving notice of the Settlement (and of requests for attorneys' fees and expenses) to the proposed settlement class, and setting various deadlines; and
4. setting a date for a hearing to consider granting final approval of the Settlement and related matters (the "Final Approval Settlement Hearing").

In support of this unopposed Motion, Lead Plaintiffs are respectfully submitting, contemporaneously herewith, an accompanying Memorandum of Law.

DATED: October 23, 2015

Respectfully submitted,
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Additional Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 23, 2015.

/s/ William C. Fredericks

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